

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

WINFRED MUCHIRA,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 1:14-cv-770
)	
HALAH AL-RAWAF, <i>et al.</i> ,)	
)	
Defendants.)	
)	

DEFENDANTS’ MOTION TO DISMISS AND TO QUASH SERVICE

Halah Alrawaf, Ibraheem Alrashoudi, Fahad Alrashoudi, and Luluh Alrashoudi, (“Defendants”), by their undersigned counsel, respectfully move to dismiss the claims of Plaintiff Winfred Muchira (“Plaintiff”) pursuant to Federal Rules of Civil Procedure 12(b)(1), 12(b)(2), 12(b)(5), and 12(b)(6), and to quash service of process pursuant to Federal Rule of Civil Procedure 4.

As more fully detailed in Defendants’ Brief in Support of Defendants’ Motion to Dismiss and to Quash Service, (i) Plaintiff has failed to effect service on Halah Alrawaf and Ibrahim Alrashoudi; (ii) Plaintiff has failed to provide adequate factual allegations to support its assertion of personal jurisdiction over Halah Alrawaf and Ibrahim Alrashoudi; (iii) Plaintiff has failed to provide adequate factual allegations to support her claims against all Defendants of involuntary servitude, trafficking, forced labor, unlawful conduct with respect to documents, benefiting financially from trafficking, related civil conspiracy, false imprisonment, and intentional infliction of emotional distress (Claims 1-7 and 9-10); and (iv) Plaintiff has further failed to provide adequate factual allegations to support her claims against Fahad Alrashoudi and Luluh Alrashoudi for unjust enrichment, violation of Fair Labor Standards Act, and related civil

conspiracy (Claims 7, 8, 11). To the extent the Court dismisses the federal claims against Fahad Alrashoudi or Luluh Alrashoudi but finds that Plaintiff raises viable state law claims against them, then Defendants respectfully request that the Court decline to exercise supplemental jurisdiction over those claims.

Wherefore, Defendants respectfully request that this Court dismiss Plaintiffs claims against them in their entirety and quash service, as outlined above, and grant such other relief as justice may require.

Dated: August 15, 2014

Respectfully submitted,

/s/ Jonathan R. DeFosse

Jonathan R. DeFosse

Virginia bar number 48220

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CERTIFICATE OF SERVICE

I certify that today, August 15, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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